

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
AMARILLO DIVISION

BEEF SOURCE INTERNATIONAL, LLC

Plaintiff,

v.

CERTAIN UNDERWRITERS AT LLOYD’S
LONDON SUBSCRIBING TO
CERTIFICATE NO. BO723144A11-008,

Defendants.

BRIT PLC,

Third-Party Plaintiff

v.

ALSFORD PAGE & GEMS LTD., ELITE
UNDERWRITERS INC., MAGNI
ENTERPRISE CORP., and XYZ
CORPORATION

Third-Party Defendants

2:14-CV-104-J

WITNESS LIST OF DEFENDANT/THIRD-PARTY PLAINTIFF BRIT PLC

TO THE HONORABLE UNITED STATES DISTRICT COURT:

Pursuant to the Court’s Pretrial Notice and Order, entered on January 26, 2016, Defendant/Third-Party Plaintiff BRIT PLC (“Brit”) submits the following list of witnesses to be called to testify at the trial of this case:

I.

WITNESSES BRIT EXPECTS TO CALL AT TRIAL

1. Peter Jeremy Stow;
2. Graham Pickering; and
3. Alastair Coles.

II.

WITNESSES BRIT MAY CALL AT TRIAL IF THE NEED ARISES

1. David M. Sharp;
2. Colin Martial;
3. Daniel Hatch;
4. Warren Shell;
5. Stacy Garcia;
6. Rodrigo Guajardo Saavedra;
7. Marco Bucarey Urbina; and
8. Arnaldo Rotella Macchiavello.

III.

**RESERVATION OF RIGHT TO CALL TRIAL WITNESSES
CALLED BY OTHER PARTIES AND/OR REBUTTAL WITNESSES**

Brit reserves the right to call any other person properly identified through discovery at the trial of the above-referenced matter if the need arises. Brit reserves the right to call rebuttal witnesses at the trial of the above-referenced matter if the need arises.

Respectfully submitted,

Eugene J. McDonald, Esq.
NJ Bar No. 003221978
7 Crown Place
Matawan, NJ 07747
Telephone: (732) 583-8485
Facsimile: (732) 583-9737
Eugene@mcdonaldmarinelaw.com

AND

Local Counsel:
MULLIN HOARD & BROWN, L.L.P.
Danny M. Needham, TBN 14854400
Christopher W. Weber, TBN 00797640
500 S. Taylor St., 800 Amarillo Plaza Two
P. O. Box 31656
Amarillo, Texas 79120-1656
Phone: (806) 372-5050
FAX: (806) 372-5086
dmneedham@mhba.com
cweber@mhba.com

/s/ Eugene J. McDonald
Eugene J. McDonald

ATTORNEYS FOR BRIT PLC

CERTIFICATE OF ELECTRONIC SERVICE

This is to certify that on February 9, 2016, the undersigned electronically filed the foregoing document with the District Clerk of the United States District Court for the Northern District of Texas, Amarillo Division, using the electronic filing system of the Court. The electronic case filing system will send via email a Notice of Electronic Filing along with a copy of this document to the following attorney of record, who has consented in writing to accept such electronic service as service of the document by electronic means:

Alex Lee Yarbrough, Esq.
John F. Massouh, Esq.
Sprouse Shrader Smith PC
701 S. Taylor, Suite 500
Amarillo, TX 79101
alex.yarbrough@sprouselaw.com
john.massouh@sprouselaw.com
Attorneys for Plaintiff

Ashley T. Parrish, Esq.
Cantey Hanger, LLP
1999 Bryan Street, Suite 3300
Dallas, TX 75201
aparrish@canteyhanger.com
Attorneys for Third-Party Defendant
Alsford Page & Gems, Ltd.

Ian R. Beliveaux, Esq.
Donato, Minx, Brown & Pool, P.C
3200 Southwest Freeway, Suite 2300
Houston, TX 77027-7525
ibeliveaux@donatominxbrown.com
Attorneys for Elite Underwriters, Inc.

Barry D. Peterson, Esq.
Peterson, Farris, Byrd & Parker, P.C.
Chase Tower
600 S. Tyler, Suite 1600
Amarillo, TX 79101
bdp@pf-lawfirm.com
Local counsel for Elite Underwriters, Inc.

/s/ Eugene McDonald
Eugene McDonald